

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

Plaintiff,

v.

JANE BUCKINGHAM,

Defendant.

Civil Action No. No. 1:19-cr-10117-IT

ASSENTED-TO MOTION FOR RETURN OF PASSPORT

Jane Buckingham, through undersigned counsel, hereby moves for the return of her United States passport upon her release from prison, which passport is in the custody of the United States Probation/Pretrial Services Office.

In support of this motion, Ms. Buckingham states as follows:

1. On April 8, 2019, Ms. Buckingham made her initial appearance in this Court, and pleaded guilty to a one count Information alleging a violation of 18 U.S.C. § 1349.
2. As part of her release conditions, the Court ordered that Ms. Buckingham surrender any passports to the United States Probation/Pretrial Services Office. Ms. Buckingham has complied with that condition and her passport is currently in the possession of the United States Probation/Pretrial Services Office.
3. On October 23, 2019, the Court sentenced Ms. Buckingham to three weeks of imprisonment.
4. Ms. Buckingham has reported to the facility to which she was designated by the Bureau of Prisons (“BOP”).

5. The United States Probation/Pretrial Services Office remains in possession of Ms. Buckingham's passport.

Accordingly, Ms. Buckingham respectfully requests that the Court direct the United States Probation/Pretrial Services Office to return her United States passport to her or undersigned counsel upon her release from BOP custody.

Respectfully submitted

/s/ Yvonne W. Chan

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Attorneys for Defendant Jane Buckingham

Dated: November 13, 2019

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)

Pursuant to Local Rule 7.1(a)(2), I hereby certify that counsel for Ms. Buckingham conferred with Assistant United States Attorney Justin O'Connell, who assents to this motion.

/s/ Yvonne W. Chan
Yvonne W. Chan

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2019, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants.

/s/ Yvonne W. Chan